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Mutual Automobile Insurance Company

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

CHRISTIAN PANTELAKIS,
Plaintiff,

vs.

STATE FARM MUTUAL AUTOMOBILE
INSURANCE COMPANY,
Defendant.

CASE NO.: 2:13-cv-02310-JAD-NJK

**STIPULATION AND ORDER FOR
EXTENSION OF TIME TO FILE REPLY IN
SUPPORT OF DEFENDANT'S MOTION FOR
PARTIAL SUMMARY JUDGMENT ON
PLAINTIFF'S EXTRA-CONTRACTUAL
CLAIMS
(FIRST REQUEST)**

IT IS HEREBY STIPULATED and AGREED between Plaintiff Christian Pantelakis ("Plaintiff"), by and through her attorneys, Eglet Law Group, and Defendant State Farm Mutual Automobile Insurance Company ("State Farm"), by and through its attorneys, Hall Jaffe & Clayton, LLP, pending the Court's approval, that the date for Defendant to file its reply in support of Defendant's Motion for Partial Summary Judgment on Plaintiff's Extra-Contractual Claims be extended from March 21, 2013 to April 6, 2015.

State Farm has previously stipulated to provide Plaintiff with several extensions in filing her opposition. Plaintiff also previously stipulated to allow State Farm to re-file its motion for partial summary judgment in order to attach additional authenticating affidavits. Recently, Plaintiff filed her opposition to State Farm's motion for partial summary judgment, which also included a counter motion

for summary judgment. State Farm was not aware that Plaintiff intended on filing a counter motion for summary judgment. It is State Farm's position that the counter motion for summary judgment is untimely and procedurally improper. Plaintiff disagrees with State Farm's position. Despite this disagreement, the parties have worked together amicably in this case, particularly as it relates to briefing deadlines. In light of this disagreement, however, State Farm may file an emergency motion to strike Plaintiff's counter motion for summary judgment or, at the very least, State Farm will need to prepare an opposition to the counter motion in addition to its reply in support of its motion for partial summary judgment. In any event, State Farm needs more time to address Plaintiff's opposition and counter motion. For that reason, the parties have stipulated to provide State Farm with a brief extension with respect to the deadline to file a reply.

It is, therefore, stipulated that State Farm shall have until April 6, 2015, to file its reply in support of its motion for party summary judgment.

DATED this 19TH day of March 2015.

HALL JAFFE & CLAYTON, LLP

/s/: Taylor G. Selim

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DATED this 19TH day of March 2015.

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ORDER

Based on the parties' stipulation, and good cause appearing,

IT IS HEREBY ORDERED that the deadline for Defendant State Farm Mutual Automobile Insurance Company's Response to Plaintiff's Opposition to the Motion for Partial Summary Judgment is extended to April 6, 2015.

DATED this 24th day of March 2015.


UNITED STATES DISTRICT JUDGE